Use of Pesticides on Marijuana Frequently Asked Questions

Q: What is a pesticide?

A: A pesticide is a substance or mixture of substances intended to prevent, kill, repel or mitigate a pest. Plant growth regulators or growth hormones are also considered pesticides. Examples of pesticides include insecticides, herbicides, fungicides, rodenticides, plant growth regulators, disinfectants, and insect repellents.

Q: What is an active ingredient?

A: A pesticide active ingredient is the chemical in a pesticide that does the killing, repelling, mitigating or growth regulation.

Q: How do I know what pesticide products I can apply to marijuana in Michigan?

A: You should only use pesticides appearing on the <u>Michigan Marijuana Pesticide List</u>. Pesticides appearing on this list have been reviewed by MDARD to ensure they can legally be used on marijuana grown in Michigan.

Q: Why are most pesticides not labeled for use on marijuana?

A: Marijuana is classified as a Schedule 1 controlled substance by the federal government and therefore, the U.S. Environmental Protection Agency (EPA) is prohibited from registering pesticide uses on the plant.

Q: What if I want to use a pesticide not included on the Michigan Marijuana Pesticide List?

A: Only use pesticides appearing on the <u>Michigan Marijuana Pesticide List</u>. These pesticides have gone through a review process to ensure they can legally be used on marijuana. If you have a question about a pesticide that's not on the list, please contact <u>MDARD-Pesticide@michigan.gov</u>.

Q: How does a product get added to the list of pesticides acceptable for use on marijuana in Michigan?

A: To appear on the Michigan Marijuana Pesticide List, the pesticide must be registered with MDARD and must be labeled appropriately to be able to be used on marijuana. To have a product evaluated, complete the Cannabis Pesticide Evaluation Form and email form, along with a copy of the product label, to MDARD-Pesticide@michigan.gov.

Q: If a product is labeled as "Organic" and/or "OMRI Listed", is it ok to apply to marijuana in Michigan?

A: Pesticide products containing the terms "Organic" or "OMRI Listed" on the product label are not automatically approved for use on marijuana. Only pesticide products included on the Michigan Marijuana Pesticide List should be applied to marijuana in Michigan.

Q: How can I find out which pesticides are registered in Michigan?

A: You can search for pesticides currently registered in Michigan at www.michigan.gov/mdard/licensing/pesticide/pestregistration.

Q: Do I need to be certified to apply pesticides to marijuana in Michigan?

A: Maybe. If you are applying general use pesticides to marijuana for a private agricultural purpose, no certification is required. However, if you apply a restricted use pesticide to marijuana for a private agricultural purpose, private pesticide applicator certification would be required. RUPs are not available for purchase or use by the public due to the potential to cause unreasonable adverse effects to the environment or human health. More information on restricted use pesticides can be found at www.michigan.gov/mdard/licensing/pesticide/rup.

Additionally, if you apply any pesticides commercially to marijuana, commercial pesticide applicator certification in 7E (for indoor applications) or 1B (for outdoor applications) would be required as well as a pesticide applicator business license. More information on pesticide applicator certification and business licensing requirements can be found at www.michigan.gov/mdardpest.

Q: Do Federal Worker Protection Standards requirements apply if I use a pesticide on marijuana in Michigan?

A: Yes. Marijuana is considered an agricultural commodity in Michigan. If you apply a pesticide containing Agricultural Use Requirements on the label (example below), compliance with Federal Worker Protection Standards is required.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

Exception: if the product is soil-injected or soil incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will there will be no contact with anything that has been treated.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with any-

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with thing that has been treated, such as plants, soil, or water, is:

Coveralls.

· Chemical-resistant gloves such as any waterproof material, and

Shoes plus socks.

More information on EPA Federal Worker Protection Standard requirements can be found at www.epa.gov/pesticide-worker-safety/agricultural-worker-protection-standard-wps.

Q: What are pesticide label requirements, and why do I need to follow them?

A: You are legally required to read and follow all the directions on a pesticide's label. EPA conducts detailed risk assessments to ensure pesticides can be used safely. The pesticide label provides critical information about how to safely handle and use the pesticide product and avoid harm to human health and the environment.

Q: How do I know what personal protective equipment (PPE) I need to wear when applying pesticides to marijuana?

A: Read the pesticide label, as it provides all the information necessary to safely handle and apply a pesticide, including PPE requirements.

Q: Where can I find more information about legal requirements to grow and process marijuana in Michigan?

A: The Cannabis Regulatory Agency regulates marijuana growers and processors in Michigan, including licensing and sampling/testing of samples. Information on marijuana requirements can be found at www.michigan.gov/cra.